

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

CRYSTAL HERNANDEZ, et al., individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

PURPOSE FINANCIAL, INC. f/k/a
ADVANCE AMERICA CASH ADVANCE
CENTERS, INC., et al.

Defendants.

C/A No. 7:23-cv-04256-JDA

NOTICE OF SETTLEMENT

PLEASE TAKE NOTICE that Plaintiffs Heather McCreedy, Scott Gibson, Kathryn Rohrer, LaToya Lindsey, Michael Smelley, Robert Durham, Stacy Lowe, Stephanie Jennings, Tirance Kennedy, Brian James, Brooke Pennington, Charles Lee Carlisle, Connie Montalvo, Don Shilling, David Turben, Dana Jones, Jose Garcia, Joseph Dodson, Howard R. Herships, John R. Wilkinson III, Jamila Hunter, Eric Speech, Juan Sanchez, Crystal Hernandez, Salvador Flores Hernandez, Kevin Ferguson, and Steven Smith, individually and on behalf of all other similarly situated individuals (“**Plaintiffs**”) and Defendants Purpose Financial, Inc. f/k/a Advance America Cash Advance Centers, Inc., and its nine subsidiary companies named in this action (collectively “**Defendants**”), have reached an agreement in principle on a class action settlement.

The Parties attended a first mediation session on February 6, 2025 and a second session on May 15, 2025 with Hon. John W. Thornton (Ret.) at JAMS. Even though the case did not resolve at mediation, the Parties continued settlement discussions with the support of Judge Thornton and have now reached a tentative agreement.

The tentative agreement needs to be committed to a final, written settlement agreement signed by the Parties, and any eventual settlement agreement will be further subject to Court

approval under Federal Rule of Civil Procedure 23. Based on the tentative agreement, however, the Parties hereby request that the Court vacate all deadlines and stay this matter pending the Parties' negotiation of the full settlement agreement and supporting documents. Plaintiffs anticipate filing a motion for preliminary approval within the next 90 days.

Dated: June 20, 2025.

Respectfully submitted,

<p>WE AGREE:</p> <p><u>/s/ Dylan Bess (with permission)</u> DYLAN A. BESS, ESQ., (Fed Id. at 13114) MORGAN & MORGAN, ATLANTA PLLC P.O. Box 57007 Atlanta, GA 30343-1007 Telephone: (404) 965-1886 sbrown@forthepeople.com</p> <p><i>Local Counsel for Plaintiffs</i></p> <p>Patrick A. Barthle II Florida Bar No. 99286 MORGAN & MORGAN COMPLEX LITIGATION GROUP 201 N. Franklin Street, 7th Floor Tampa, Florida 33602 Telephone: (813) 229-4023 Facsimile: (813) 222-4708 pbarthle@ForThePeople.com</p> <p>Terence R. Coates MARKOVITS, STOCK, & DEMARCO, LLC 119 E. Court St., Ste. 530 Cincinnati, Ohio 45202 Telephone: (513) 651-3700 Facsimile: (513) 665-0219 tcoates@msdlegal.com jwalker@msdlegal.com</p>	<p>WE AGREE:</p> <p><u>/s/ George G. Robertson</u> George G. Robertson (Fed Id. at 12803) HOLLAND & KNIGHT LLP 811 Main Street, Suite 2500 Houston, Texas 77002 Telephone: (731) 821-7000 Email: george.robertson@hklaw.com</p> <p>Mark S. Melodia (admitted pro hac vice) HOLLAND & KNIGHT LLP 31 West 52nd Street New York, NY 10019 Telephone: (212) 513-3583 Email: mark.melodia@hklaw.com</p> <p>Ashley L. Shively (admitted pro hac vice) HOLLAND & KNIGHT LLP 560 Mission Street, Suite 1900 San Francisco, CA 94105 Telephone: (415) 743-6900 Email: ashley.shively@hklaw.com</p> <p>Samuel W. Outten (Federal Id. at 2943) Rayja N. Fowler (Federal Id. at 10456) NELSON MULLINS RILEY & SCARBOROUGH LLP 2 West Washington Street, Suite 400 Greenville, SC 29601 (864) 373-2300 (864) 232-2925 facsimile Email: sam.outten@nelsonmullins.com Email: rayja.fowler@nelsonmullins.com</p> <p><i>Attorneys for Defendants</i></p>
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Plaintiffs' Executive Committee

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was provided to all counsel of record in accordance with the Federal Rules of Civil Procedure on June 20, 2025.

/s/ George G. Robertson

George G. Robertson